

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

THE DEPARTMENT OF THE TREASURY OF THE
STATE OF NEW JERSEY AND ITS DIVISION, OF
INVESTMENT, on behalf of itself and all others similarly
situated,

Plaintiff,

-against-

CLIFFS NATURAL RESOURCES INC., JOSEPH
CARRABBA, LAURIE BRLAS, TERRANCE PARADIE,
and DAVID B. BLAKE,

Defendants.

Case No. 14-CV-1031-DAP

ELECTRONICALLY FILED

CLASS ACTION

**DEFENDANTS' MOTION
FOR LEAVE TO FILE
DOCUMENTS UNDER SEAL**

Defendants Cliffs Natural Resources Inc. ("Cliffs"), Joseph Carrabba, Laurie Brlas, Terrance M. Paradie, and David B. Blake (collectively, the "Defendants") hereby move the Court, pursuant to Local Rule 5.2, to file the following exhibits attached to Defendants' Memorandum of Law in Support of their Motion Pursuant to Federal Rule of Civil Procedure 12(f) to Strike Certain Allegations from the Amended Class Action Complaint ("Motion to Strike"), which is being filed concurrently with this Motion, under seal:

1. Declaration of CW 7, attached as Exhibit A to the Motion to Strike;
2. Declaration of CW 17, attached as Exhibit B to the Motion to Strike; and
3. Declaration of CW 18, attached as Exhibit C to the Motion to Strike.

Good cause exists for this Motion, as each of the aforementioned documents contains the identity of individuals on whom Plaintiff relied as a "Confidential Witness" in its Amended Class Action Complaint. Defendants have been requested to attempt to preserve the confidential